Tetra Tech EM Inc.

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September 15, 1997

Mr. Michael Bellot
Remedial Project Manager
Remedial Response Unit No. 1 (SR-6J)
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Subject: **Technical Review of Addenda to Field Sampling Plan and Quality Assurance Project Plan for Predesign Investigative Activities at Blackwell Forest Preserve Landfill Contract No. 68-W8-0084, Work Assignment No. 84-5P6Y**

Dear Mr. Bellot:

Tetra Tech EM Inc. (Tetra Tech) has reviewed the above-referenced documents dated August 28, 1997. Montgomery Watson prepared these documents for the Forest Preserve District of DuPage County, Illinois (FPD), in response to U.S. Environmental Protection Agency (EPA) comments. These comments indicated that FPD should (1) conduct a subsurface soil investigation at the North Storm Water Pipe's discharge point if sampling indicates contaminants in the pipe and (2) collect surface water and sediment samples from Sand Pond before FPD redevelops the pond for public access. The documents include (1) a transmittal letter that outlines the proposed sampling programs, (2) Addendum No. 4 to the predesign investigation field sampling plan (FSP), and (3) Addendum No. 4 to the predesign investigation quality assurance project plan (QAPP).

Tetra Tech reviewed these documents for technical adequacy and consistency with the approved FSP and QAPP. Tetra Tech's review indicates that the documents are generally consistent with the approved FSP and QAPP. However, the documents contain several inconsistencies and require additional details. These deficiencies are discussed below.

Transmittal Letter

- Page 2, paragraph 2 of the transmittal letter states that the subsurface soil investigation will involve collecting one soil sample each for analysis from locations about one-third and two-thirds the distance between manhole 1 (MH-1) and manhole 2 (MH-2). The distance between the two manholes is about 250 feet. Therefore, one soil sample would be collected about 80 feet from MH-1 and the other about 80 feet from MH-2. The text should be revised to (1) justify the proposed number of and distance between soil sampling locations and (2) describe how the analytical results will be used to evaluate subsurface impacts of storm water discharges.

- Page 2, paragraph 3 of the transmittal letter and page 4, item 6 of Addendum No. 4 to the FSP state that a background groundwater sample will be collected from Pine Lake. However, note 7 in Table 1 of Addendum No. 4 to the QAPP states that a surface water sample will be collected from Pine Lake. This discrepancy should be resolved. Moreover, if a groundwater sample is to be collected near Pine Lake in lieu of a surface water sample from Pine Lake, the transmittal letter should be revised to present the rationale for collecting the groundwater sample.

- If the number or type of proposed investigative samples or proposed sampling locations is revised in response to these comments, these revisions should be consistently reflected in the transmittal letter, Addendum No. 4 to the FSP, and Addendum No. 4 to the QAPP. In addition, a scaled figure or map of the Blackwell Forest Preserve Landfill site should be provided that shows all proposed sampling locations.

Addendum No. 4 to FSP

- In Section 2.3, Surface Water Sampling, the text on page 4 does not discuss sediment sampling at Sand Pond and Pine Lake. If sediment sampling is to be conducted in accordance with the August 1990 work plan for the remedial investigation and feasibility study (RI/FS), this should be stated in Section 2.3. In addition, Section 2.3 should be revised to describe any changes to the RI/FS work plan sediment sampling procedures that will be used for this investigation.

Addendum No. 4 to QAPP

- In Table 1, notes 5 and 7 require clarification or revision as described below.

  Note 5. This note states that matrix spike/matrix spike duplicate (MS/MSD) samples will not be collected but will be analyzed and the results reported in accordance with standard operating procedures (SOP) and standard laboratory practice. This note appears to indicate that no additional sample volume will collected for MS/MSD samples. If such is the case, this note applies to soil and sediment samples but not to surface water samples. This matter should be clarified. Moreover, the note should refer to specific and not general SOPs and laboratory practices.

  Note 7. This note discusses surface water and sediment samples. If appropriate, this note should be revised to state that a groundwater sample and not a surface water sample will be collected at Pine Lake. In addition, this note should state that one surface water sample and one sediment sample will be collected from Sand Pond.

- Table 2 identifies container, preservative, and packaging requirements for soil and sediment samples. The table title should be revised to clarify that requirements are presented only for soil and sediment samples. In addition, in the "bottles and jars" column, the text should be revised to indicate that the required containers are wide-

mouth glass jars. Moreover, for target compound list semivolatile organic compound analysis, the container size should be 16 ounces instead of 4 ounces.

These comments should be addressed before the proposed investigations are implemented. If you have any questions regarding Tetra Tech's comments, please call me at (312) 856-8737.

Sincerely,

Stanley Labunski

cc: Steve Nathan, EPA Project Officer
Marguerite Hendrixson, EPA Contracting Officer
Majid Chaudhry, Tetra Tech Program Manager